

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

**Stanley Rollins,**

**Plaintiff,**

**v.**

**Circle K Stores, Inc.,**

**Defendant.**

**Case No.: 2:22-cv-2689-RMG  
Formerly Case No. 2022CP1003034**

**NOTICE OF REMOVAL**

**TO: THE UNITED STATES COURT:**

Defendant, Circle K Stores, Inc., would respectfully show the Court in support of its Notice of Removal that:

1. The Summons and Complaint in this action were filed on July 6, 2022, in the Court of Common Pleas for Charleston County, South Carolina. Attached for the Court are copies of Plaintiff's Summons and Complaint filed as state court documents. The Complaint is the first pleading served upon the Defendant in this action and service was effected on July 13, 2022.

2. The United States District Court has jurisdiction over this action pursuant to 28 U.S.C. §1332. The Plaintiff is a resident and citizen of the State of South Carolina; Defendant Circle K Stores, Inc., is incorporated in the State of Texas with its principal place of business in the State of Arizona. The action has been brought by the Plaintiff against the Defendant for an alleged accident which occurred in Charleston County, South Carolina.

3. Venue is proper in this matter in the Charleston Division of this Court in accordance with 28 U.S.C. §1441(a).

4. Upon information and belief, the amount in controversy in this matter exceeds \$75,000.00 based on Plaintiff's response to Request for Admission provided on August 10, 2022, where Plaintiff indicated that the amount in controversy exceeds \$75,000.00. Pursuant to 28 U.S.C. §1446(b)(3), §1446(c)(3)(A) the Plaintiff's response to the Request for Admission was the "paper from which it may be first ascertained that the case is one which is or has become removable."

5. Defendant will furnish a copy of this Notice of Removal to the Clerk of Court for Charleston County.

Respectfully submitted,

**SWEENY, WINGATE & BARROW, P.A.**

s/Ryan C. Holt  
Ryan C. Holt Fed. I.D. No. 10736  
Grace G. Brown Fed. I.D. No. 13592  
Sweeny, Wingate & Barrow, P.A.  
Post Office Box 12129  
Columbia, SC 29211  
(803) 256-2233

**ATTORNEYS FOR THE DEFENDANT**

Columbia, South Carolina

August 15, 2022